

EXHIBIT 3
(Egilman Deposition Transcript)

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION,) Case No.
7) 1:17-MD-2804
8)
9 THIS DOCUMENT RELATES TO) Hon. Dan A.
10 ALL CASES) Polster
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Friday, April 26, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

Videotaped Deposition of DAVID S.
EGILMAN, M.D., MPH, held at the Providence
Marriott Downtown, 1 Orms Street, Providence,
Rhode Island, commencing at 9:08 a.m., on the
above date, before Debra A. Dibble, Certified
Court Reporter, Registered Diplomate
Reporter, Certified Realtime Captioner,
Certified Realtime Reporter and Notary
Public.

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1 corrected on the record by
2 Dr. Egilman.

3 EXAMINATION

4 BY MS. FINGER:

5 Q. Dr. Egilman, my name is Anna
6 Finger. I'm at Locke Lord, and I represent
7 Henry Schein, Incorporated and Henry Schein
8 Medical Facility, Incorporated. I'm going to
9 refer to them herein as Henry Schein or the
10 Henry Schein defendants. Is that okay?

11 A. Sure.

12 Q. And so you had access to review
13 all documents produced by Henry Schein in
14 this litigation; correct?

15 A. Right. I think they came in
16 late, though. So I didn't have that much
17 time on those documents.

18 Q. Okay. But you had access to
19 all of their documents; correct?

20 A. Right. At some point in time.

21 Q. Okay. And you do not list any
22 opinions in your report that specifically
23 mention Henry Schein; correct?

24 A. Correct.

1 Q. And Henry Schein is not
2 specifically identified as a member in what
3 you call "the venture"; correct?

4 A. Correct.

5 MS. FINGER: That's all I have.
6 I'll pass the witness.

7 THE WITNESS: Great job.

8 EXAMINATION

9 BY MS. SAULINO:

10 Q. Dr. Egilman, it's Jennifer
11 Saulino for McKesson again. I'm back.

12 A. Welcome back.

13 Q. Thank you.

14 So first, because you've kindly
15 made this offer to us several times, I'd like
16 to ask you, on the record, whether you are
17 willing to sit for additional hours of the
18 deposition so that all of the defendants can
19 have sufficient time to explore your numerous
20 opinions.

21 A. No. Unless ordered by the
22 judge.

23 Q. Okay. So you are only willing
24 to talk by telephone with us?